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By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **EXPARTE**
Dorcast, Inc.[1]

Dear Ms. Dortch:

Submitted herewith on behalf of Dotcast, Inc. ("Dotcast") are the following reports prepared by the Advanced Television Technology Center ("ATTC")setting forth the results of laboratory tests conducted by the ATTC to evaluate the impact of Dotcast's dNTSC system on adjacent and co-channel NTSC and DTV television stations: (1) dNTSC DATA BROADCASTING. *dNTSC Compatibility with Adjacent and Co-Channel DTV and NTSC Stations,* Test Plan and Procedures (Doc. No. 02-30. Dec. 2002); (2) dNTSC DATA BROADCASTING, *dNTSC Compatibility with Adjacent and Co-Channel DTV Stations,* Summary of Test Results (Doc. No. 02-31, Dec. *2002)* ("Repon No. 3"); and (3) dNTSC DATA BROADCASTING, *dNTSC Compatibility with Adjacent and Co-Channel NTSC Stations,* Summary of Test Results (Doc. No. 02-32. Dec. *2002)* ("Report No. 3"). On June 28. *2002.* the Commission approved the use of Dotcast's dNTSC system by broadcast stations conditioned on rhe submission of the foregoing reports within six months.[2] This submission thus satisfies the condition imposed on the Commission's authorization of the commercial deployment of the dNTSC system.

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[1] This proceeding is subject io the Commission's "perinit-but-disclose" procedures. *See* Public Notice. Application of Dotcusr. Inc. for Approval of System for Insertion of Non-Video Data Pursuant to Section 73.682 — "Permit But Disclose" *Ex Parte* Status Accorded. 17 FCC Rcd 6109 (2002).

[2] *See* Letter to Douglas B. Evans. General Counsel. Doicast. Inc., *et al* . from W Kennsth Ferree, Chief. Media Bureau. ai 10 (dated June 28. 2002).

As explained more fully in the reports, there were no significant differences in the desired/undesired ratios when dNTSC was added to co-channel and first upper and lower adjacent channel NTSC signals. In the few cases in which *any* differences were found, the participants actually rated the clips as *better* when dNTSC was added. *See* Report No. 3 at 13. With respect to co-channel and first upper and lower adjacent channel DTV signals, Report No. 2 explains that each of six different DTV receivers was tested seven times in 18 different reception conditions. These tests were initially performed at a -24dB dNTSC visual injection level, which is 2dB higher than Dotcast's operating injection level of -26dB. Even at this higher injection level, it was noted that in most cases, there was no significant difference between "dNTSC off' and dNTSC on." *See* Report No. 2 at 8-9, n.3.[3] One receiver exhibited *improved* adjacent channel performance in moderate and weak DTV signal conditions at the higher injection level.

Of the 18 test conditions at -24 dB, only five cases exhibited a measurable response to the addition of dNTSC (other than the cases of improved performance noted above).[4] After re-testing at the -26dB injection level, four of the five cases were within 0.50dB of the "dNTSC off' condition, taking into account the 1dB margin of error noted above, while a single receiver (Receiver E) exhibited a greater than 2dB difference in the first adjacent upper channel in a weak DTV signal condition. It should be noted that this particular receiver showed far greater variation in its performance in the "dNTSC off" condition than any other receiver tested,' which suggests the presence of an anomaly in the receiver that may have skewed the test results.

Based on the totality of the tests described above and taking into account ATTC's margin of error, Dotcast has concluded that, at the injection level employed in the current system design, the addition of dNTSC will not cause any additional interference to adjacent or co-channel NTSC or DTV stations.

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[3] As ATTC notes in Report No. 2, the statistical nature of digital communications systems and the behavior of certain DTV receivers results in some measurement variation from trial to trial. The measurement resolution is therefore limited by the test methodology, and variations within 1dB should be considered "measurement noise." *Id.* at 9.

[4] *See* Report No. 2 at 9, n.3.

See id., Tables 4.5, 4.7, 4.12 (approximately 3.5dB variation even within the seven "dNTSC off" trials), and 4.15.

Two copies of this letter have been submitted to the Secretary of the Commission for inclusion in the public record, as required by Section 1.1206(b)(2) of the Commission's rules.

Very truly yours,

Margaret L. Tobey

Margaret L. Tobey

cc: Keith Larson (by e-mail)
Robert Bromery (by e-mail)
Qualex International (by e-mail)

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